

**CONFIDENTIAL**

ILT 180 010 324

REMEDIAL SITE ASSESSMENT DECISION - EPA REGION 5

Site Name:

B. J. Goodrich Company

EPA ID#:

IL4 980 606 784

Alias Site Names:

City:

Derry

County or Parish:

Marshall

State:

IL

Refer to Report Dated:

9-21-1995

Report type:

FSIP Site Disposition Memo (Interim)

Report developed by:

IL EPA

US EPA RECORDS CENTER REGION 5



490292

**DECISION:**

☒ 1. Further Remedial Site Assessment under CERCLA (Superfund) is not required because:

☒ 1a. Site does not qualify for further remedial site assessment under CERCLA

☐ 1b. Site may qualify for further action, but is deferred to:

☐ RCRA  
☐ NRC

No Further Remedial Action Planned (NFRAP)

☐ 1 c. Archive

☐ 2. Further Assessment Needed Under CERCLA:

2a. (optional) Priority: ☐ Higher ☐ Lower

2b. Activity  
Type:

☐ PA  
☐ SI

☐ ESI  
☐ HRS evaluation

☐ Other: \_\_\_\_\_

**DISCUSSION/RATIONALE:**

The attached memo is an interim Site Disposition Memo. The complete FSIP report will be submitted shortly. Based on the information presented, and conversations with Mr. Ken Coddell, EPA, it is recommended this site receive a NFRAP designation.

I herein approve the submittal and document the decision.

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Report Reviewed  
and Approved by:

Signature:

Sonia P. Vega

Date:

9-29-95

Site Decision  
Made by:

Signature:

Sonia P. Vega

Date:

9-29-95

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NFA

1156 SP Wam C.



State of Illinois

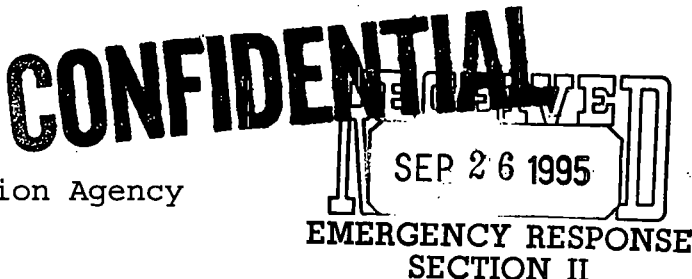
# ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

September 21, 1995

Ms. Sonia Vega  
Site Assessment Manager  
U.S. Environmental Protection Agency  
Region 5 Offices, HSE-5J  
77 West Jackson  
Chicago, IL 60604



## SITE RECOMMENDATION MEMO

The B.F. Goodrich Company (<sup>ILT 180 010324</sup>~~ILD#980606784~~) is an active, polyvinyl chloride (PVC) chemical manufacturing facility located in Henry, Illinois in Marshall County. Illinois EPA was tasked by USEPA to perform an SIP investigation on the site during this past fiscal year.

The B.F. Goodrich plant was constructed in 1958, on a bluff immediately adjacent to the Illinois River, one mile north of the City of Henry. Plant operations began in 1959 and remain active to date. The plant structures, active areas, formerly active areas and additional property occupy approximately 260 acres of land at this location. The process area occupies about 55 acres of this total. Prior to B.F. Goodrich's establishment this particular parcel of land was entirely agricultural land. Site operations consist of manufacture of PVC and accelerators for use in rubber vulcanizing. A few of the approximately 100 chemicals used in the manufacture of PVC and accelerators include biphenyl amines, acetone, benzene, phosphorus, trichloride, chloroacetic acid, phenol, diamine, acetonitrile, sulfuric acid, bleach, chlorine, hydrochloric acid, cyclohexane, butylamine, tetrahydrofuran, isopropanol solution and iso-octane. North of the process area and east between the process area and the edge of the river bluff are seven former wastewater treatment sludge and PVC process waste sludge lagoons. Three lagoons are located east of the process area the remaining four are north. The three lagoons to the east were the first to be taken out of service and closed. This occurred in the late 1970's and early 1980's. The other lagoons were closed by the mid 1980's. All lagoons had final cover and caps placed over them in 1987. A small landfill was also located northeast of the process area. Demolition and construction debris and small metal and cardboard containers were noted to be placed in this fill area in the early 1970's. This area was also utilized to burn the items mentioned. The landfill was closed prior to the lagoon closures but covered at the same

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time as lagoon covering and capping. Cover material over the lagoons and landfill area ranges from three to four feet in thickness.

The site had a high priority CERCLA status following a September 1988 Site Inspection. The inspection noted that the site is located in remote rural setting with the process facility portion of the site entirely fenced including a security gate at the site entry point. Collection of soil/sediment samples was conducted along the river bank upstream and downstream of the site. Groundwater sampling was conducted on and off-site. Elevated levels of n-nitrosodiphenylamine were detected in two soil/sediment samples adjacent to the site. Elevated levels of twelve PAH's were detected in the two upstream samples as well as Arsenic, Barium, Chromium, and Copper in the upstream sample located about five miles north of the site. However, all levels were below any removal action levels or MCL's. Groundwater samples were collected from one on-site drinking water well (west side of site), two on-site production wells (central and east portion of site), one off-site residential well (immediately across road south of site) and the City of Henry's public well #3 (1 1/2 miles south of the site). Analysis revealed various elevated VOC and semi-VOC constituent levels in the two production wells. No concentrations were above any removal action levels or MCL's.

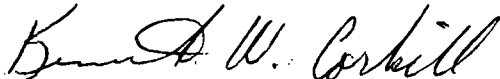
An SIP file review was conducted by IEPA in the summer of 1995. Upon review of Agency files, after a site reconnaissance and speaking with Agency and plant personnel, the site was noted to be involved in a self imposed cleanup and improvement program. The plant also undergoes annual RCRA inspections conducted by IEPA's Peoria field personnel. In 1988, B.F. Goodrich began a plant improvement program and groundwater monitoring program. Approximately nine million dollars have been spent on plant improvements since 1988. These include plant production and general plant improvements, removing UST's, diking around storage tanks, the mentioned covering of the lagoons and landfill and installation of 21 groundwater monitor wells. Twelve wells are shallow (40'-50'), nine are deep (100'-120'). The SIP reconnaissance revealed a very well engineered and maintained cap with a thick cover of established, mowed grass covering the entire 12.7 acre area of former lagoons and landfill. There is no ponding, no leachate seeps or run-off channels visible and no refuse protruding at any point around the site. During a meeting at the facility prior to the reconnaissance, plant personnel and their consultant presented the author with a package of monitor well analytical information gathered quarterly since their installation in 1988. Also supplied was information regarding lagoon construction. Early lagoons were not lined. These include three lagoons east of the production facility. All lagoons to the north of the production facility received

clay liners of between one and one-half to three feet thick. Review of the groundwater quality information showed various chlorinated solvents, BTEX and BNA compounds in the wells. Review of this information also has shown that over time there is a general decrease in concentrations of compounds and a decrease in the number of wells with detectable concentrations of the compounds. The analytical data shows that degradation of chlorinated organics is occurring and that the groundwater system is attenuating and degrading the VOC's. A water table map, also provided, indicates groundwater flow direction to be west to east at the plant site, with the Illinois River acting as a groundwater recharge and discharge area. Also noted was that the residence south of the plant was sold to the City of Henry in 1993. Occupants no longer reside in this dwelling. The well is still available for use but has not been used regularly. It is considered a standby well. The well has never been found to be contaminated.

B.F. Goodrich is currently continuing the monitoring of the groundwater network and monitoring the covers over the lagoons and landfill for cap integrity and working toward further site improvements.

The author of this report recommends that The B.F. Goodrich Company site, ~~ILD#980606784~~ located in Henry, Illinois receive a no further action rating at this time. Enclosed you will find the CERCLA Site Inspection Prioritization Report. Please contact me if you have any further questions at 217/524-1664. *ILT 180 010324*

Sincerely,



Kenneth W. Corkill  
Illinois Environmental Protection Agency  
Bureau of Land  
Site Assessment Unit